

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

MICHAEL BRENT KOVACH,

)

)

Plaintiff,

)

)

Vs.

)

Civil Action No.: 1:06cv159-MEF

)

)

**MID SOUTH HOME CARE
SERVICES, INC.,**

)

)

Defendant.

JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER

The parties jointly move for the entry by this court of the Protective Order which is attached as Exhibit A to this motion. In support of this motion, the parties suggest to the court that the instant case is likely to include documents relating to the personal background and employment circumstances of a number of third persons. Such documents may include information of a private or confidential nature. In order to protect the confidentiality of any such documents or information, the parties have stipulated and agreed to the entry of the Protective Order attached as Exhibit A to this motion.

/s/ William C. Carn, III

William C. Carn, III (ASB-1166-A54W)
Lee & McInish, P.C.
P.O. Box 1665
Dothan, AL 36302
Phone: (334) 792-4156
Fax: (334) 794-8342

/s/ Jon C. Goldfarb

Jon C. Goldfarb
Wiggins, Childs, Quinn & Pantanzis, P.C.
301 19th Street North
The Kress Building

Birmingham, AL 35203-3204
Phone: (205)314-0500
Fax: (205)254-1500

Dated this the 9th day of August, 2006.